



State of New Hampshire
DEPARTMENT OF ENVIRONMENTAL SERVICES

6 Hazen Drive, P.O. Box 95, Concord, NH 03302-0095

(603) 271-1370 FAX (603) 271-1381

March 5, 2003



Mr. David Cash
Huggins Hospital
240 South Main Street
Wolfeboro, New Hampshire 03894

CERTIFIED MAIL (7099 3400 0003 0687 1878)
RETURN RECEIPT REQUESTED
LETTER OF DEFICIENCY
ARD No. 2003-003

Dear Mr. Cash:

On June 13, 2002, the New Hampshire Department of Environmental Services, Air Resources Division ("DES") conducted a compliance inspection at Huggins Hospital located in Wolfeboro, NH. The purpose of the inspection was to determine Huggins Hospital's compliance status with State Operating Permit FP-S-0025, in effect through June 30, 2002 ("the Permit") and the NH Administrative Rules Env-A 100 *et seq.* All references to the Permit in this letter are to the version of the Permit issued to Huggins Hospital on June 4, 1997 and amended on June 15, 1999, that was in effect at the time of the compliance inspection.

As a result of the inspection and subsequent file review, this Letter of Deficiency ("LOD") is being sent to identify the following deficiencies:

1. Condition VII.A of the Permit requires Huggins Hospital to submit to DES an annual report of the monthly consumption of fuel oil combusted by Cleaver Brooks Boilers #1 and #2 for each calendar year by the following April 15. Huggins Hospital has not submitted the annual report of monthly fuel combustion for calendar year 2001 that was required to be submitted to DES no later than April 15, 2002;
2. Condition VII.B of the Permit requires Huggins Hospital to submit to DES an annual report of the hours of operation of Emergency Generators #1 and #2 for each calendar year by the following April 15. Huggins Hospital has not submitted the annual report of hours of operation for calendar year 2001 that was required to be submitted to DES no later than April 15, 2002;
3. Condition VII.E of the Permit states that Huggins Hospital is subject to the NOx recordkeeping and reporting requirements of Env-A 900. Env-A 905.02 requires Huggins Hospital to maintain records during the high ozone season (June 1 through August 31) for each combustion device, including the hours of operation, type and amount of fuel combusted, NOx emissions for each calendar year, and NOx emissions in pounds per hour for a typical ozone day. Env-A 909.03 requires Huggins Hospital to report the data required to be maintained by Env-A 905 to DES by April 15 of the following calendar year. Huggins Hospital has not submitted the data required to be reported to DES by Env-A 900 for calendar year 2001 by April 15, 2002; and
4. Condition VI.F requires Huggins Hospital to pay an annual emission-based fee to DES in accordance with Env-A 704.03 for each calendar year by the following October 15. The deadline for payment of calendar year 2001 emission-based fees was extended to December 15, 2002. Huggins Hospital has not submitted the annual emissions-based fee payment for calendar year 2001 that was required to be submitted by December 15, 2002.

DES believes that the above referenced deficiencies can be resolved if, within 45 days of issuance of this LOD, Huggins Hospital submits to DES the annual reporting of operating and emissions data for calendar year 2001 required to be submitted by Conditions VII.A, VII.B and VII.C of the Permit and by Env-A 900. Upon receipt of this data, DES will calculate the fees owed by Huggins Hospital for calendar year 2001 actual emissions, and invoice Huggins Hospital for the past-due emission-based fees.

In the event that Huggins Hospital fails to comply with the conditions above and within the time periods indicated, DES may initiate further action against Huggins Hospital including issuing an order requiring the deficiencies to be corrected, and/or referring this matter to the NH Department of Justice.

Please address all information to Mr. Raymond Walters, Senior Enforcement Engineer, at the following address:

NHDES Air Resources Division
Compliance Bureau
6 Hazen Drive
P.O. Box 95
Concord, NH 03302-0095

It is the goal of DES to promote the prevention of pollution at the source as the preferred option for meeting established environmental goals. DES strives to ensure that pollution prevention options are considered first, followed by recycling, treatment and disposal. In the event that Huggins Hospital has any questions about pollution prevention, please feel free to contact Stephanie D'Agostino at (603) 271-6398.

Please be advised that DES will continue to monitor Huggins Hospital's compliance status and that this letter does not provide relief against any other existing or future deficiencies. It is important that Huggins Hospital be aware of all the requirements in its Permit. In accordance with Env-A 608.10, *Permit Renewal*, applications to renew State Permits to Operate are due to DES 90 days prior to the expiration date of an existing permit. Huggins Hospital's permit, FP-S-0025, expires October 31, 2007. Therefore, the renewal application is due to DES on or before August 2, 2007. Further, please note that the annual reporting of operating and emissions data required by Conditions VII.A, VII.B and VII.C of the Permit and by Env-A 900 for calendar year 2002 is required to be submitted to DES no later than April 15, 2003 and emissions-based fees are due by October 15, 2003.

Please feel free to contact DES should you have any questions regarding compliance with the N.H Code of Administrative Rules Env-A 100 *et seq.*, and the requirements of the Permit. A current copy of the rules can be obtained from the DES website at www.des.state.nh.us/ard/ardrules.htm, or by contacting the Public Information Center at (603) 271-2975. If you have any questions regarding this matter, please contact Ray Walters at (603) 271-6288 or Mary Ruel at (603) 271-6795.

Sincerely,



Pamela G. Monroe
Compliance Bureau Administrator,
Air Resources Division

PGM/mob

G. Rule, Legal Unit
S. D'Agostino, NHDES Pollution Prevention Coordinator
R. Kurowski, EPA Region I
S. Ganem Chairperson of Selectmen, Town of Wolfeboro
Enforcement File #3300300004